

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

IN RE:	* CHAPTER 13
KELVIN BRUCE WHITE,	CASE NO. 15-30597-KLP
Debtor.	*

JRK RESID. AMERICA LLC  
Movant.

v.

KELVIN BRUCE WHITE, Debtor  
SUZANNE E. WADE, Trustee  
Respondents.

\* \* \* \* \*

**MOTION FOR RELIEF FROM STAY**

**NOTICE TO DEBTOR(s): Failure to file a written response to this motion with the Clerk of the United States Bankruptcy Court and to send Plaintiff a copy within 15 days from date of certificate of service may result in entry of a default judgment.**

COMES NOW your Movant, JRK Resid. America LLC, by counsel, and files this Motion for Relief from Stay to terminate, annul, modify or condition the automatic stay pursuant to 11 U.S.C. 362(d), and in support thereof states the following:

1. This Court has proper jurisdiction over the matters herein alleged pursuant to 28 U.S.C. §1334. This matter constitutes a core proceeding within the meaning of 28 U.S.C. §157 and a contested matter under Rules of Bankruptcy procedure 4001 and 9014.

2. On February 6, 2015, debtor filed a petition under Chapter 13 of the United States Bankruptcy Code.

3. Plaintiff is a Creditor in this proceeding by virtue of its ownership of an apartment located at 4904 Burnt Oak Drive, Apt. 203, Richmond, VA 23234 which was let to

Debtor under an Apartment Lease Contract dated October 29, 2014 (copy attached as Exhibit A).

4. The monthly rent is \$1,009.00 plus late charges and utility charges.
5. Debtor has failed to make their post-petition payment for March, 2015.
6. There are substantial pre-petition arrearages, costs and fees due on the account making the total amount as of the date of this filing of \$5,757.10, excluding attorney's fees and costs incurred herein.
7. Any attempted affirmation must cure or promptly cure the defaults aforesaid.
8. Your Movant has not received any cure or adequate assurance of cure as of the date of the filing of this motion.

WHEREFORE, these premises considered, Plaintiff moves this Court to grant it full relief from the automatic stay provisions of 11 U.S.C. §362, or, if full relief cannot be had, to grant such other relief as may seem proper to the Court.

JRK Resid. America LLC  
By Counsel

By: /s/ Lauren French  
Lauren French, Esq. VSB: #85478  
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Attorney for Movant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing Motion was transmitted to all parties listed on the ECF system and mailed first-class, postage prepaid this 27th day of March, 2015 to:

Kelvin Bruce White  
4904 Burnt Oak Dr.  
Apt. 203  
Richmond, VA 23234  
Debtor

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Attorney for Debtor

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Trustee

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U.S. Trustee

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/s/ Lauren French  
Lauren French, Esq.